

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF TEXAS

SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
V.	§	NO. 4:16CR081
	§	(Judge Mazzant)
ARMANDO PEDRO RODRIGUEZ	§	

**MOTION FOR CONTINUANCE OF PRETRIAL MOTION DATES,
CHANGE OF PLEA DEADLINE, AND FINAL PRETRIAL CONFERENCE DATE**

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TEXAS;

COMES NOW, Defendant ARMANDO RODRIGUEZ, by and through his undersigned
attorney, and files this, his MOTION FOR CONTINUANCE OF PRETRIAL MOTION DATES,
CHANGE OF PLEA DEADLINE, AND FINAL PRETRIAL CONFERENCE DATE, and would
show this Honorable Court as follows, to-wit:

I

PROCEDURAL HISTORY

On the 21st day of June, 2016, the Defendant, Rodriguez was indicted in a one-count
indictment alleging a violation of 21 U.S.C. §846 (Conspiracy to Possess with the Intent to
Manufacture and Distribute Methamphetamine). On or about June 21, 2016, Defendant Rodriguez
appeared before United States Magistrate Judge Christine Nowak for an Initial Appearance and
Arraignment on the instant indictment. At that time, the Office of the Federal Public Defender for
the Eastern District of Texas was appointed to represent the Defendant. The Pretrial Order relating

to Pretrial Discovery and Inspection was filed, and the order imposed a deadline of July 19, 2016, for a change of plea by the Defendant and scheduled a Final Pretrial Conference for August 5, 2016.

GROUND FOR MOTION

Defense counsel is currently in the process of receiving and reviewing discovery. Because of the nature of the offense and the possible punishment, defense counsel must then carefully review the evidence with the Defendant and insure that all questions are answered. In addition, there are issues that defense counsel wishes to discuss with the government and present to the Defendant. Defendant respectfully requests additional time to discuss the case with counsel for the government and insure that all evidence is reviewed in order to make a fully informed decision. This request is made in order to insure that effective assistance of counsel is provided to the Defendant.

Due to the reason outlined above, Defendant respectfully requests an additional 60 days for the pretrial motion dates, change of plea deadline, and final pretrial conference date.

WHEREFORE PREMISES CONSIDERED, Defendant respectfully requests that the pretrial motion dates, change of plea deadline, and final pretrial conference date in this case be reset from their current setting.

Respectfully submitted,

/s/ Denise S. Benson
DENISE S. BENSON
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Attorney for Defendant

CERTIFICATE OF CONFERENCE

Defense counsel contacted Assistant United States Attorney, Ernest Gonzalez, and the Government does not oppose this motion.

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of July, a true and correct copy of the foregoing Defendant's MOTION FOR CONTINUANCE OF PRETRIAL MOTION DATES, CHANGE OF PLEA DEADLINE, AND FINAL PRETRIAL CONFERENCE DATE was sent by CM/ECF to:

Ernest Gonzalez
Assistant U.S. Attorney
101 E. Park Blvd., Ste. 500
Plano, Texas 75074

/s/ Denise Benson
DENISE BENSON
Attorney for Defendant